

April 27, 2023

RECEIVED
SDNY PRO SE OFFICE

2023 MAY -1 PM 4:11

United States District Court
Southern District of New York
500 Pearl Street PRO SE OFFICE
NY NY 10007

Re: 23 CV 2532

ANNALISA RIVERA-FRANZ

vs

167 AVENUE B ASSOCIATES LLC and
HECKATE'S HEARTH CORP.

Hon. Judge Broderick
Dear Judge Broderick,

I am Ronald S. Hason. I am a "member" of 167 AVENUE B ASSOCIATES LLC, one of the defendants in the above action. 167 AVENUE B ASSOCIATES LLC is the owner of a small building on the Lower Eastside of Manhattan. HECKATE'S HEARTH CORP., by it's principal officer, Abigail Ehmann, is the commercial (store) tenant in that building.

At the beginning of this month, I was informed by Ms. Ehmann that we were being sued for a violation of the ADA act regarding accessibility to the commercial space. She told me that she knew who the plaintiff was, and that she was going to try and make a settlement. She said that she was going to handle it. Several days later I received an unsolicited offer from an unknown Law Group (copy enclosed) informing me that I was being sued, and offering to represent me. That is the only "notice" I received regarding the pending lawsuit.

Several weeks have gone by. I asked Ms. Ehmann what was happening with the lawsuit. She told me that she had not been served with any papers. Neither had I, but I was feeling uncomfortable about doing nothing, so I telephoned your PRO SE office to get some information. The first thing I found out was that I am not PRO SE since not me, but my corporation is being sued.

I was advised to write a letter to Judge Broderick requesting more time to allow a settlement to go forward, or if there is no settlement, to allow me time to find appropriate legal representation as may be necessary. Accordingly, I hereby request an extension of time and any other relief which may be available to allow me to make an answer, as may be required by the court.

Thank you for your consideration.

Yours truly



Ronald S. Hason 917 716 5686
167 Avenue B Associates LLC
167 Avenue B #1R
NY NY 10009

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANNALISA RIVERA-FRANZ

CV

Plaintiff,

-against-

COMPLAINT

167 AVENUE B ASSOCIATES LLC AND
HEKATE'S HEARTH CORP.

JURY TRIAL REQUESTED

Defendants.
-----X

23 CV 2532

COMPLAINT

Plaintiff Annalisa Rivera-Franz (hereafter referred to as "Plaintiff"), by counsel, Parker Hanski LLC, as and for the Complaint in this action against Defendants 167 Avenue B Associates LLC and Hekate's Hearth Corp. (together referred to as "Defendants"), hereby alleges as follows:

NATURE OF THE CLAIMS

1. This lawsuit opposes pervasive, ongoing, and inexcusable disability discrimination by the Defendants. In this action, Plaintiff seeks declaratory, injunctive, and equitable relief, as well as monetary damages, nominal damages, and attorney's fees, costs, and expenses to redress Defendants' unlawful disability discrimination against Plaintiff, in violation of Title III of the Americans with Disabilities Act ("ADA") 42 U.S.C. §§ 12181 *et. seq.* and its implementing regulations; the New York State Human Rights Law ("NYSHRL"), Article 15 of the New York State Executive Law ("Executive Law"); the New York State Civil Rights Law, § 40 *et. seq.*; and the New York City Human Rights Law ("NYCHRL"), Title 8 of the Administrative Code of the City of New York ("Administrative Code"). As explained more fully below, Defendants own, lease,

Attorney Advertisement



WWW.MKCLAWGROUP.COM

NEW YORK:

1250 BROADWAY, 36TH FL. STE. 300
NEW YORK, NEW YORK 10001
(212) 726-1104 FAX (212) 726-3104

FORT LEE:

2 EXECUTIVE DRIVE, STE. 240
FORT LEE, NEW JERSEY 07024
(201) 708-6675 FAX (201) 708-6676

HOBOKEN:

300 HUDSON STREET. STE. 10
HOBOKEN, NEW JERSEY 07030
(201) 203-7476 FAX (201) 708-6676

** Please Reply to: New York*

EMAIL: MKC@MKCLAWGROUP.COM

March 29, 2023

167 Avenue B Associates LLC
167 Avenue B, 1R
New York, NY 10009
Attn.: Ronald Hason

Re: Rivera-Franz v. 167 Avenue B Associates LLC et al
Docket No.: 1:23-cv-02532 (SDNY)
Date Filed: 03/24/2023

Dear Mr. Hason:

The above referenced lawsuit has recently been filed against you and or your company concerning ADA claims. I am writing this letter to offer my law firm's professional services to you. We are a full service law firm (labor/employment, litigation, real estate, tax, immigration, commercial transactions) with a focus on representing individuals and businesses. Please kindly contact my New York office (212-726-1104) or email me at MKC@mkclawgroup.com so that I can provide you with a free consultation on this matter, and discuss your case with you. I can also come out to your location. My firm seeks to offer cost effective legal services. I look forward to speaking with you.

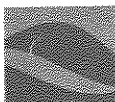
Very Truly Yours,


Michael K. Chong, Esq.

MKC'/p

¹ Before making your choice of attorney, you should give this matter careful thought. The selection of an attorney is an important decision. The recipient may, if this letter is inaccurate or misleading, report same to the Committee on Attorney Advertising, Hughes Justice Complex, CN 037, Trenton, New Jersey 08625. If you are already represented by counsel in this matter, or have resolved this matter, we thank you for your time.

Mr Ronald S Hason
167 Avenue B Apt 1R
New York, NY 10009-4661



RDC 99



10007

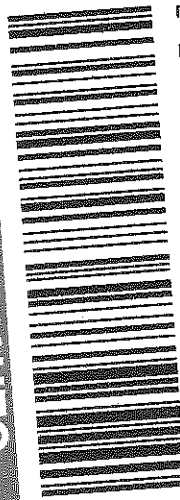
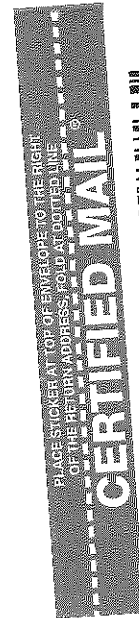
U.S. POSTAGE PAID
FORM LETTER NY
10009
APR 27, 23
AMOUNT

\$8.37

R2304E107189-80

U.S.M.
SDNY

U.S. District Court
SDNY Pearl St. Pro Se Office
500
NY NY 10007



9589 0710 5270 0455 0427 37

100070415 0099